

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEPHANIE JONES, JONESWORKS LLC,

Plaintiffs,

v.

JENNIFER ABEL, MELISSA NATHAN, JUSTIN
BALDONI, WAYFARER STUDIOS LLC, and
JOHN DOES 1-10,

Defendants.

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC,
JUSTIN BALDONI, JAMEY HEATH, STEVE
SAROWITZ, IT ENDS WITH US MOVIE LLC,
MELISSA NATHAN, THE AGENCY GROUP
PR LLC, JENNIFER ABEL, JED WALLACE,
and STREET RELATIONS INC.,

Defendants.

JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.

Case No.: 1:25-cv-00779-LJL

Case No.: 1:24-cv-10049-LJL (lead case)

**DECLARATION OF DANIEL J. POHLMAN
IN SUPPORT OF RESPONSE IN OPPOSITION**

I, Daniel John Pohlman, under 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney admitted to practice before this Court, am a Counsel at the law firm Pryor Cashman LLP, 7 Times Square, New York, New York 10036, and am counsel of record for nonparties Katherine Case and Breanna Butler Koslow in this consolidated action.

2. I respectfully submit this declaration in support of Ms. Katherine Case and Ms. Breanna Butler Koslow's letter-response in opposition to the motion ([Dkt. 89](#)) filed by Stephanie Jones and Jonesworks LLC to compel Ms. Case and Ms. Butler Koslow's compliance with two subpoenas duces tecum issued in the above-captioned action. I aver the truth of all statements made in Ms. Case and Ms. Butler Koslow's letter-response.

3. Prior to July 21, 2025, I met and conferred with counsel for the Jones parties regarding their subpoenas once, on March 21, 2025. A true and correct copy of an email scheduling that conference is attached as **Exhibit A** hereto. In that meet and confer, I told counsel for the Jones parties that although Ms. Case and Ms. Butler Koslow were amenable to producing documents, given the patent overbreadth of the subpoenas as propounded, they would not do so unless and until the subpoenas were withdrawn and re-served with narrowed requests.

4. Thereafter, despite conferring with the Jones parties regarding separate issues regarding this matter on March 26, 2025 (as shown in a true and correct copy on an email dated March 24, 2025, attached as **Exhibit B** hereto), the Jones parties never again reached out to further confer. Given the unequivocal statements I made on March 21, 2025, it was my supposition that the Jones parties had recognized both the overbreadth of their subpoenas and their ability to obtain duplicative discovery from parties to the litigation, and that they had abandoned the improper subpoenas as a result.

5. That reasonable supposition was dashed four months later, on July 21, 2025, when, with no legitimate explanation or justification, counsel for the Jones parties sent a letter demanding full compliance with their subpoenas by July 25, 2025. Thereafter, as set forth in the motion and opposition, letters were exchanged and the parties conferred.

6. A true and correct copy of a July 30, 2025 email from counsel for the Jones parties, sent following the prior day's meet-and-confer, is attached as **Exhibit C** hereto.

Dated: New York, New York
August 1, 2025

Respectfully submitted,

/s/ Daniel J. Pohlman

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